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### IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

In RE:

LAURA I, GALINDEZ MATOS \* CHAPTER 11

\* CASE NO. 15-02794-MCF

\*

DEBTORS \*

\*\*\*\*\*\*\*\*\*\*\*\*

## <u>SUPPLEMENT TO THE SMALL BUSINESS CHAPTER 11 PLAN OF REORGANIZATION</u> <u>DRA, LAURA I. GALINDEZ MATOS, RE: AMENDED EXHIBITS E, G AND G-1</u>

#### TO THE HONORABLE COURT:

NOW COMES the above-named debtors through the undersigned attorney and very respectfully prays and alleges:

- 1. That debtor filed Small Business Chapter 11 Plan of Reorganization dated September 5, 2017 and herewith supplements the same with amended Exhibit E, five year cash flow projection; amended Exhibit G, detail of claims and monthly payments; and Amended Exhibit G-1, claims recap per class.
  - 2. A hearing on confirmation of the Small Business Reorganization Plan is scheduled for

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December 4, 2017 at 10:30 a.m.

WHEREFORE it is respectfully requested that this Honorable Court take notice of the aforestated.

I CERTIFY that on this date I have electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all CM/ECF participants, to Assistant us Attorney, Monsita Lecaroz, Esq., to Chapter 13 Trustee Alejandro Oliveras, Esq., and by First Class U.S. Mail to parties in interest.

In San Juan, PR this 22 of November 2017.

/S/EMILY DARICE DAVILA EMILY D. DAVILA, ESQ. USDC-PR 214503 420 PONCE DE LEON, MIDTOWN 311 SAN JUAN, PR 00918 TEL. 759-8090 FAX 759-9620 davilalawe@prtc.net

AMENDED

EXHIBIT E

### LAURA I. CANDELAS MATOS 17-01578 ESL

Five ye	ears cash	<i>flow</i>	projections	

Five years cash flow projections	Effective	1 month	2 month	3 month	4 month	5 month	6 month	7 month	8 month	9 month	10 month	11 month	12 month	1 Year	2 Year	3 Year	4 Year	5 Year
	Date																	
Beginning Cash Balance	\$ 3,000.00	\$ 3,000.00	\$ 3,941.65	\$ 768.55	\$ 227.40	\$ 1,169.06	\$ 2,110.71	\$ (1,222.39)	\$ (1,378.23)	\$ (3,607.09)	\$ (3,263.88)	\$ (849.07)	\$ (2,374.48) \$	3,000.00	\$ 6.19	(2,673.62)	\$ (4,653.18)	\$ (7,543.05)
Cash Receipts:  Acct receivable collections - Medical Office		36,281.00	36,281.00	36,281.00	36,281.00	36,281.00	36,281.00	36,643.81	37,010.25	37,380.35	37,754.15	38,131.70	38,513.01	443,119.27	447,550.46	452,025.97	452,025.97	452,025.97
(amounts collected net of 7% income tax wi		30,281.00	30,281.00	30,281.00	30,281.00	30,281.00	30,281.00	30,043.81	37,010.23	37,380.33	37,734.13	36,131.70	36,313.01	443,119.27	447,330.40	432,023.97	432,023.97	432,023.97
Acct receivable collections pre-petition	umeia)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Alimony		3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	36,000.00	36,000.00	36,000.00	36,000.00	36,000.00
Total Cash Available	\$ 3,000.00	\$ 42,281.00	\$ 43,222.65	\$ 40,049.55	\$ 39,508.40	\$ 40,450.06	\$ 41,391.71	\$ 38,421.42	\$ 38,632.02	\$ 36,773.26	\$ 37,490.27	\$ 40,282.62	\$ 39,138.53 \$	482,119.27	\$ 483,556.65 \$	485,352.34	\$ 483,372.78	\$ 480,482.92
Cash Disbursements:																		
Contracted Service	0.00	9,344.00	9,344.00	9,344.00	9,344.00	9,344.00	9,344.00	9,344.00	9,344.00	9,344.00	9,344.00	9,344.00	9,344.00	112,128.00	112,128.00	112,128.00	112,128.00	114,370.56
Net payroll	0.00	3,493.00	3,493.00	3,493.00	3,493.00	3,493.00	3,493.00	3,493.00	3,493.00	3,493.00	3,493.00	3,493.00	3,493.00	41,916.00	41,916.00	41,916.00	41,916.00	42,754.32
Payroll taxes	0.00	972.00	972.00	972.00	972.00	972.00	972.00	972.00	972.00	972.00	972.00	972.00	972.00	11,664.00	11,664.00	11,664.00	11,664.00	11,897.28
Purchase of Medical & Office Supplies	0.00	4,233.00	4,233.00	4,233.00	4,233.00	4,233.00	4,233.00	4,233.00	4,233.00	4,233.00	4,233.00	4,233.00	4,233.00	50,796.00	51,303.96	51,817.00	52,335.17	53,381.87
Insurance Expense	0.00	595.00	595.00	595.00	595.00	595.00	595.00	595.00	595.00	595.00	595.00	595.00	595.00	7,140.00	7,497.00	7,871.85	7,871.85	7,871.85
Light, Water and Telphone Utilities	0.00	1,866.00	1,866.00	1,866.00	1,866.00	1,866.00	1,866.00	1,866.00	1,866.00	1,866.00	1,866.00	1,866.00	1,866.00	22,392.00	23,511.60	24,687.18	24,934.05	25,183.39
Auto Expense	0.00	215.00	215.00	215.00	215.00	215.00	215.00	215.00	215.00	215.00	215.00	215.00	215.00	2,579.96	2,605.76	2,631.82	2,658.14	2,684.72
Dues & Subscriptions	0.00	523.00	523.00	523.00	523.00	523.00	523.00	523.00	523.00	523.00	523.00	523.00	523.00	6,276.00	6,589.80	6,919.29	6,919.29	6,919.29
State Insurance Fund Premium	0.00	0.00	215.00	0.00	0.00	0.00	0.00	0.00	0.00	215.00	0.00	0.00	0.00	430.00	434.30	438.64	443.03	447.46
Bank Charges	0.00	345.00	345.00	345.00	345.00	345.00	345.00	345.00	345.00	345.00	345.00	345.00	345.00	4,140.00	4,347.00	4,564.35	4,609.99	4,656.09
Repairs and maintenance	0.00	563.00	563.00	563.00	563.00	563.00	563.00	563.00	563.00	563.00	563.00	563.00	563.00	6,756.00	6,823.56	6,891.80	6,960.71	7,030.32
Promotion and other miscellaneous	0.00	145.00	145.00	145.00	145.00	145.00	145.00	145.00	145.00	145.00	145.00	563.00	563.00	2,576.00	2,704.80	2,840.04	2,840.04	2,840.04
Municipal License Tax	0.00	0.00	0.00	1,107.80	0.00	0.00	0.00	0.00	0.00	1,107.80	0.00	0.00	0.00	2,215.60	2,326.38	2,442.70	2,442.70	2,442.70
Personal Property Tax	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,460.30	0.00	0.00	0.00	0.00	0.00	1,460.30	1,474.91	1,489.65	1,489.65	1,489.65
FICA Self Employment Tax	0.00	0.00	3,899.76	0.00	0.00	0.00	3,899.76	0.00	3,899.76	0.00	0.00	3,899.76	0.00	15,599.02	15,755.01	15,755.01	15,755.01	16,070.11
Pending Adm Exp- Paid at Effective Date	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Cash Disbursements	0.00	22,294.00	26,408.75	23,401.80	22,294.00	22,294.00	26,193.75	23,754.30	26,193.75	23,616.79	22,294.00	26,611.75	22,712.00	288,068.88	291,082.08	294,057.33	294,967.64	300,039.66
Cash Available for Reorganization	\$ 3,000.00	\$ 19,987.00	\$ 16,813.90	\$ 16,647.75	\$ 17,214.41	\$ 18,156.06	\$ 15,197.96	\$ 14,667.12	\$ 12,438.26	\$ 13,156.47	\$ 15,196.28	\$ 13,670.87	\$ 16,426.54 \$	194,050.39	\$ 192,474.58 \$	191,295.02	\$ 188,405.15	\$ 180,443.26
D : (: :/																		
Reorganization items																800.00	800.00	800.00
Legal Fees US Trustee				375.00			375.00			375.00			375.00	1,500.00	1,500.00	1,500.00	1,500.00	1,500.00
Priority claims:				373.00			373.00			373.00			373.00	1,500.00	1,500.00	1,300.00	1,500.00	1,300.00
IRS		1,707.00	1,707.00	1,707.00	1,707.00	1,707.00	1,707.00	1,707.00	1,707.00	1,707.00	1,707.00	1,707.00	1,707.00	20,484.00	20,484.00	20,484.00	20,484.00	6,828.00
PR Treasury		2,692.50	2,692.50	2,692.50	2,692.50	2,692.50	2,692.50	2,692.50	2,692.50	2,692.50	2,692.50	2,692.50	2,692.50	32,310.00	32,310.00	32,310.00	32,310.00	10,770.00
Municipio de San Juan		124.51	124.51	124.51	124.51	124.51	124.51	124.51	124.51	124.51	124.51	124.51	124.51	1,494.12	1,494.12	1,494.12	1,494.12	498.04
CRIM		49.09	49.09	49.09	49.09	49.09	49.09	49.09	49.09	49.09	49.09	49.09	49.09	589.08	589.08	589.08	589.08	196.36
Secured Claims - Class 1		1,950.25	1,950.25	1,950.25	1,950.25	1,950.25	1,950.25	1,950.25	1,950.25	1,950.25	1,950.25	1,950.25	1,950.25	23,403.00	23,403.00	23,403.00	23,403.00	23,403.00
General Unsecured Claims - Class 2		322.00	322.00	322.00	322.00	322.00	322.00	322.00	322.00	322.00	322.00	322.00	322.00	3,864.00	3,864.00	3,864.00	3,864.00	3,864.00
Personal Living Expenses		9,200.00	9,200.00	9,200.00	9,200.00	9,200.00	9,200.00	9,200.00	9,200.00	9,200.00	9,200.00	9,200.00	9,200.00	110,400.00	111,504.00	111,504.00	111,504.00	113,734.08
Total Reorganization Items	\$ -	\$ 16,045.35	\$ 16,045.35	\$ 16,420.35	16,045.35	\$ 16,045.35	\$ 16,420.35	\$ 16,045.35	\$ 16,045.35	\$ 16,420.35	\$ 16,045.35	\$ 16,045.35	\$ 16,420.35 \$	194,044.20	\$ 195,148.20 \$	195,948.20	\$ 195,948.20	\$ 161,593.48
Ending Cash Balance	\$ 3,000,00	\$ 3,941.65	\$ 768.55	\$ 22740 9	S 1.169.06	\$ 2.110.71	\$ (1.222.39)	\$ (1,378.23)	\$ (3,607.09)	\$ (3.263.88)	\$ (849.07)	\$ (2,374.48)	\$ 6.19 \$	6 19	\$ (2,673.62) \$	(4.653.18)	\$ (7.543.05)	\$ 18,849.78
	7 2,000.00	- 2,711.03	- 100.55	- 227.10	. 1,107.00	,110./1	- (1,222.37)	+ (1,070.20)	(2,007.07)	+ (5,205.00)	+ (015.07)	- ( <del>-,</del> 5/1110)	ψ 0.17 ψ	0.17	- (2,075.02) ψ	(.,555.10)	- (,,515.05)	, 10,017.70

**EXHIBIT G** 

### DRA. LAURA I. GALINDEZ MATOS DETAIL OF CLAIMS AND MONTHLY PAYMENTS

#### ALLOWED CLAIM PER CLASS

		ALLOWED CLAIM PER CLASS									
POC #	CREDITOR	CLAIM	SECURED CLAIMS	PRIORITY TAX CLAIMS	OTHER PRIORITY CLAIMS	GENERAL UNSECURED CLAIMS	% OFFER	PROPOSED CLAIM BALANCE TO BE PAID	TERM IN YEARS	PROPOSED MONTHLY PAYMENT UNDER PLAN	TOTAL PAYOUT
1	DISCOVER BANK	6,228.59				6,228.59	3.0%	186.86	5.00	3.11	186.86
2	AMERICAN EXPRESS BANK	15,754.40				15,754.40	3.0%	472.63	5.00	7.88	472.63
3	AMERICAN EXPRESS CENTURION BANK	11,802.86				11,802.86	3.0%	354.09	5.00	5.90	354.09
4	POPULAR AUTO (surrendered)	17,972.73					0.0%	-	N/A	-	N/A
5	INTERNAL REVENUE SERVICE	79,657.87		79,657.87			100.0%	79,657.87	4.33	1,707.00	88,764.00
5	INTERNAL REVENUE SERVICE	28,298.09		73,037.07		28,298.09	3.0%	848.94	5.00	14.15	848.94
		,				,					
6	MERCEDES BENZ FINANCIAL SERVICES	67,550.00	67,550.00				100.0%	67,550.00	5.00	1,321.69	79,301.40
6	MERCEDES BENZ FINANCIAL SERVICES	49,582.65				49,582.65	3.0%	1,487.48	5.00	24.79	1,487.48
7	CRIM	2,290.99		2,290.99			100.0%	2,290.99	4.33	49.09	2,552.68
7	CRIM	17,038.24		2,230.33		17,038.24	3.0%	511.15	5.00	8.52	2,332.08 511.15
,	CHIVI	17,030.24				17,030.24	3.070	311.13	3.00	0.32	311.13
8	MERCEDES BENZ FINANCIAL SERVICES	32,125.00	32,125.00				100.0%	32,125.00	5.00	628.56	37,713.60
8	MERCEDES BENZ FINANCIAL SERVICES	10,313.08				10,313.08	3.0%	309.39	5.00	5.16	309.39
0	MALINICIPIO DE CANCILLANI	F 010 F1		F 010 F1			100.00/	F 010 F1	4.22	124.54	C 474 F2
9 9	MUNICIPIO DE SAN JUAN MUNICIPIO DE SAN JUAN	5,810.51 2,939.55		5,810.51		2,939.55	100.0% 3.0%	5,810.51 88.19	4.33 5.00	124.51 1.47	6,474.52 88.19
J	MONICH TO DE SAN JOAN	2,333.33				2,333.33	3.070	55.15	5.00	1.47	00.15
10	PREMIER BANKCARD LLC	924.57				924.57	3.0%	27.74	5.00	0.46	27.74
11	PREMIER BANKCARD LLC	630.90				630.90	3.0%	18.93	5.00	0.32	18.93
12	BANCO POPULAR DE PR	11,498.79				11,498.79	3.0%	344.96	5.00	5.75	344.96
13	PR DEPARTMENT OF TREASURY	125,646.70		125,646.70			100.0%	125,646.70	4.33	2,692.50	140,010.00
13	PR DEPARTMENT OF TREASURY	463,586.66		123,010.70		463,586.66	3.0%	13,907.60	5.00	231.79	13,907.60
14	STATE INSURANCE FUND	641.06				641.06	3.0%	19.23	5.00	0.32	19.23
N/A	CHASE MANHATTAN	15,915.15				15,915.15	3.0%	477.45	5.00	7.96	477.45
N/A	MACY'S	5,479.13				5,479.13	3.0%	164.37	5.00	2.74	164.37
N/A	SEARS CARD	3,876.32				3,876.32	3.0%	116.29	5.00	1.94	116.29
	TOTAL CLAIMS	\$ 975,563.84	\$ 99,675.00	\$ 213,406.07	\$ 0.00	\$ 644,510.04		\$ 332,416.37		\$ 6,845.61	\$ 374,151.50

### **AMENDED**

### **EXHIBIT G-1**

# DRA. LAURA I. GALINDEZ MATOS <u>CLAIMS RECAP PER CLASS:</u>

	ONTHLY YMENT	LUMI	TOTAL LUMP SUM PAY OUT					TOTAL ALLOWED CLAIMS		
1) SECURED CLAIMS None	\$ 1,950	\$	0	\$	117,015	N/A	\$	99,675		
2) UNSECURED CLAIMS Class 1	322		0		19,335	3.00%		644,510		
3) <b>PRIORITY TAX CLAIMS</b>	 4,573		0		237,801	111.43%		213,406		
TOTAL CLAIMS	\$ 6,846	\$	0	\$	374,152		\$	957,591		